

IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA



UNITED STATES OF AMERICA :  
 :  
v. : 1:18CR 352-1  
 :  
HAYDN PATRICK THOMAS, :  
also known as Patrick Haydn Thomas :  
and Hayden Patrick Thomas :

The United States Attorney charges:

COUNT ONE

From on or about September 13, 2012, until on or about May 23, 2014, in the County of Durham, in the Middle District of North Carolina, HAYDN PATRICK THOMAS, also known as Patrick Haydn Thomas and Hayden Patrick Thomas, in a matter involving a health care benefit program affecting commerce, namely Medicaid, did knowingly and willfully, in connection with the delivery of and payment for health care benefits and services, make or cause to be made a materially false and fraudulent entry and statement in claim forms submitted for client K.T. by Durham County Mental & Behavioral Services, LLC, (DCMBHS) which falsely stated that K.T. had received mental health services from DCMBHS in the approximate amount of \$10,600.00; in violation of Title 18, United States Code, Sections 1035 and 2.

## COUNT TWO

From in or about January 2014 through in or about April 2015, the exact dates unknown, in the County of Durham, in the Middle District of North Carolina, HAYDN PATRICK THOMAS, also known as Patrick Haydn Thomas and Hayden Patrick Thomas, a resident of Durham, North Carolina, willfully attempted to evade and defeat substantial income tax due and owing by him to the United States of America, for the calendar year 2014, by committing the following affirmative acts, among others:

a. Transferring and causing to be transferred approximately \$275,000 from the bank account ending in 7128, in the name of DCMBHS at Branch Banking and Trust Company, to a bank account ending in 5771, in the name of Patrick Hayden Thomas at Citibank, N.A.;

b. Transferring and causing to be transferred approximately \$115,000 from the bank account ending in 7128, in the name of DCMBHS at Branch Banking and Trust Company, to a bank account ending in 4635, in the name of Hayden Patrick Thomas at Citibank, N.A.;

c. Transferring and causing to be transferred approximately \$45,000 from the bank account ending in 7128, in the name of DCMBHS at Brank Banking and Trust Company, to a bank account ending in 6084, in the name of HPT Enterprises Inc. at Citibank, N.A.;

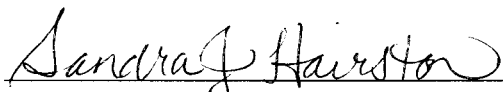
d. Transferring and causing to be transferred approximately \$37,000.00 to an individual with the initials S.C. and directing S.C. to return the funds in cash.

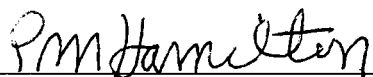
e. Providing false income information to his tax return preparer for the preparation of his U.S. Individual Income Tax Return, IRS Form 1040, for tax year 2014; and

f. Preparing and causing to be prepared, and submitting and causing to be submitted to the IRS, a false and fraudulent U.S. Individual Income Tax Return, IRS Form 1040, for tax year 2014.

In violation of Title 26, United States Code, Section 7201.

DATED: September 5, 2018

*for*   
MATTHEW G.T. MARTIN  
United States Attorney

  
BY: ROBERT M. HAMILTON  
Assistant United States Attorney